

CENTRAL SCHOOL DISTRICT 13J

1610 Monmouth Street Independence, Oregon 97351-1096 503-838-0030

Before the
Federal Communication Commission
Washington, D.C. 20554

RECEIVED**APR 28 1993**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Replacement of Part 90) P R Docket 92-235
by Part 88 to Revise)
the Private Land Mobile)
Radio Services and Modify)
the Policies Governing them)

To: The Commission

Comment of
Central School District #13J
1610 Monmouth Street
Independence, Oregon 97351

Central School District 13J submits its comments in response to the Commission's Notice of Proposed Rule Making in this proceeding.

1) Although your proposed changes may be appropriate, you are not allowing us the necessary time to look at the alternatives, watch their reliability, and make the proper decision. It takes more time than you are allowing to set up the budget needs for such a change. We need to preview alternatives and cooperatively (with Administrators and our Board of Directors) make a decision. Both of these needs are very time consuming, especially since there is not currently proven quality narrowband equipment in our marketplace. Allowing the next 10 years for the design and quality of these new radios to be proven effective would make better sense.

School districts are somewhat slower to adapt to change than the rest of this world, mostly due to procedures to do such. They are also less likely to buy anything without researching the product.

2) We're concerned about your plan to reduce the power of the radios. Our district is flat, but covers an area with an approximate radius of 30 miles. Reducing our power could easily mean no longer having communication with the outlying areas within our district. We consider a "lack of communication" to be a safety hazard one we wish to avoid.

Also, lowering the power will, I assume, mean adding relays, etc. that will cost more for our daily operation. Keep in mind, we're a school district very much in need of our radio system but unable to easily afford a new one.

3) We're also concerned that the changes you are making seem to be somewhat questionable. True, more frequent

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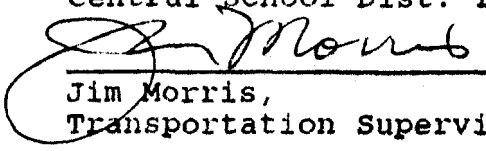
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needed, but will your solution solve the problem? Will your solution even make things better than they currently are?!

We suggest that an indepth study be done to document that your changes will make land - mobile - services better and more efficient for the future. And perhaps, even more cost effective.

Respectfully submitted,
Central School Dist. 13J


Jim Morris,
Transportation Supervisor